

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In re:

DARYL FRED HELLER,

Debtor.

Case No.: 25-11354 (JNP)

Judge: Poslusny

Chapter: 11

**NOTICE OF MOTION OF DEERFIELD CAPITAL, LLC FOR AN ORDER
IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
TO EXECUTE ITS PLEDGE AS TO HELLER INVESTMENT HOLDINGS, LLC
AND GCC INVESTMENT HOLDINGS, LLC**

PLEASE TAKE NOTICE that on the 23rd day of September 2025 at 11:00 am., or as soon thereafter as counsel may be heard, the undersigned attorneys for Deerfield Capital LLC, interested party (“Deerfield”), will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, United States Bankruptcy Court, 400 Cooper Street, Courtroom 4C, Camden, New Jersey 08101, for entry of an order authorizing the Debtor to continue to use existing bank accounts pursuant to sections 105(a) and 363 of title 11 of the United States Code (the “Bankruptcy Code”) (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Debtor will rely upon the enclosed Certification of Eric Warfel and the proposed form of order.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested, and, or cross-motions, if any, shall be filed with the Clerk of

the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3, in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

Respectfully submitted,

CIARDI CIARDI & ASTIN

/s/ Albert A. Ciardi, III

Albert A. Ciardi, III, Esquire
Counsel for the Deerfield Capital, LLC

Date: August 22, 2025